

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In Re:

Kristina E. Zauner,

Debtor(s).

Case No. 13-10867

Judge Jessica Price Smith

Chapter 7 Case

**TRUSTEE'S MOTION FOR ORDER DIRECTING DEBTOR(S)**  
**TO TURN OVER PROPERTY OF THE ESTATE**

Lauren A. Helbling, Trustee herein, respectfully moves the Court for the entry of an Order directing the debtor(s) to turn over property of the estate and, in support of this motion, states as follows:

1. This case was commenced by the filing of a voluntary petition under Chapter 7 of the Bankruptcy Code on February 13, 2013.
2. At the time of the commencement of this bankruptcy case, the debtor(s) was entitled to receive tax refunds from the Internal Revenue Service and the State of Ohio in the aggregate amount of \$5,506.
4. At the time of the commencement of this bankruptcy case, the debtor(s) had cash on hand and funds on deposit in the aggregate amount of \$314.
5. The non-exempt portion of the debtor(s) cash on hand, funds on deposit and federal and state income tax refunds is the aggregate amount of \$1,527 which is property of the estate pursuant to the provisions of §541 of the Bankruptcy Code and subject to turn over pursuant to the provisions of §542 of the Bankruptcy Code.

WHEREFORE, your Trustee prays that this motion be granted and that the debtor(s) be directed to turn over to the Trustee the sum of \$1,527 within thirty (30) days of execution of the Order granting this motion or immediately upon receipt of the refunds, whichever occurs later.

/s/Lauren A. Helbling (0038934)  
Lauren A. Helbling Co. LPA  
1370 Ontario St., #450  
Cleveland, OH 44113  
Tel 216/781-1164 Fax 216/575-1405  
lhelbling@epitrustee.com

### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing Motion for Order Directing Debtor(s) to Turnover Property of the Estate was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Gerald D. Piszczek, Esq., on behalf of Debtor, at [piszczeklaw@yahoo.com](mailto:piszczeklaw@yahoo.com)

U.S. Trustee (Registered address)@usdoj.gov

And by regular U.S. Mail, postage pre-paid, to all parties in interest on the attached service list this 28<sup>th</sup> day of March, 2013.

/s/Lauren A. Helbling (0038934)

Kristina E. Zauner  
8718 Albion Road  
North Royalton, OH 44133